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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a Republic of Seychelles Company,

Plaintiff,

VS.

TENZA TRADING LTD., a Cyprus Company,

Defendant.

No. 3:13-cv-01045-SI

DECLARATION OF DEVON ZASTROW NEWMAN IN SUPPORT OF DEFENDANT TENZA TRADING LTD.'S RESPONSE TO CALISTA'S MOTION FOR ADOPTION OF PROPOSED ORDER REGARDING CALISTA'S DISCOVERY REQUESTS ADDRESSED IN JANUARY 31, 2014 HEARING

Page 1 - DECLARATION OF NEWMAN IN SUPPORT OF TENZA'S RESPONSE TO CALISTA MOTION FOR ADOPTION OF PROPOSED ORDER RE CALISTA DISCOVERY REQUESTS

SCHWABE, WILLIAMSON & WYATT, P.C. Attorneys at Law Pacwest Center 1211 SW 5th Ave., Suite 1900 Portland, OR 97204 Telephone: 503.222.9981 Fax: 503.796.2900 I, Devon Zastrow Newman, declare that the following is true and correct:

1. I am one of the attorneys for Defendant, Tenza Trading Ltd. ("Tenza") in the above-captioned case. I have personal knowledge of the facts and information set forth herein and if called as a witness I could and would testify accordingly. I make this declaration based upon my personal knowledge and belief in support of Defendant Tenza Trading Ltd's Response to Plaintiff Calista Enterprises Ltd.'s ("Calista") Motion for Adoption of Proposed Order Regarding Calista's Discovery Requests Addressed in January 31, 2014 Hearing.

2. Attached as Exhibit A is a true and correct copy of an email exchange between myself and attorney for Calista, Matthew Shayefar, dated February 25-26, 2014.

I hereby declare that the above statement, including information contained in the exhibit, is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury pursuant to the laws of the United States.

Dated this 3rd day of March, 2014.

s/ Devon Zastrow Newman
Devon Zastrow Newman